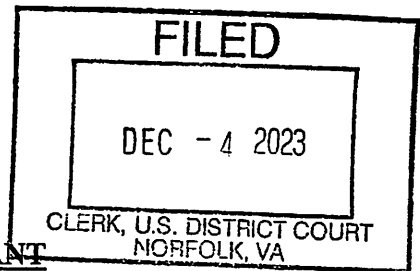


**AFFIDAVIT IN SUPPORT OF AN APPLICATION  
FOR A CRIMINAL COMPLAINT AND ARREST WARRANT**



I, Stefan Hinds, being first duly sworn, hereby depose and state as follows:

1. I have been a Postal Inspector with the U.S. Postal Inspection Service (USPIS) since February 2020 and am currently assigned to the Washington Division, Richmond, Virginia, Domicile. As a Postal Inspector, I am charged with investigating crimes with a nexus to the U.S. Postal Service ("USPS") or U.S. mail, including but not limited to mail theft, mail fraud, financial fraud, identity theft, robberies and burglaries of postal facilities, assaults and threats on postal employees, investigations of dangerous and prohibited mails, narcotics, and cybercrime. Since January 2023, I have also served as a Special Deputy United States Marshal with the United States Marshals Service assigned to the Capital Area Regional Fugitive Task Force (CARFTF) Richmond. Prior to my tenure with the USPIS, I was a Special Agent with the U.S. Department of Treasury Inspector General for Tax Administration for more than two years and served in the Cyber Investigative Cadre there. In connection with these roles, I completed in excess of 400 hours of instruction at the Federal Law Enforcement Training Center in Glynco, Georgia and graduated the Criminal Investigator Training Program and the Special Agent Basic Training, which included training in arrest procedures, applying for and executing search and seizure warrants, and various other criminal laws and procedures. I have also received specialized training from the Federal Bureau of Investigation's Cellular Analysis Survey Team in historical cell site analysis and geospatial mapping and from the National Cyber-Forensics & Training Alliance.

2. In connection with these roles, I have either led or been involved in a wide range of cybercrime, identity theft, and fraud investigations into individual targets and their co-conspirators using computers, other electronic devices, and the Internet unlawfully to access or use other computers or devices and to defraud individual victims and institutions, including banks and the U.S. Government, including via public benefits fraud. Through this training and experience, I have become very familiar with the various methods and means these criminals and their co-conspirators use to execute their often complex and sophisticated schemes, including, for instance, using social media to enable bank fraud "card cracking" schemes. Given the broad scope of my areas of responsibilities with the USPIS and my involvement in CARFTF, I have also conducted and participated in investigations related to drug trafficking, firearms, money laundering, and violent crime, including the theft of money and property (belonging both to individuals and the Government) by fraud or force, as well as armed and unarmed assault of government employees. In connection with these duties and investigations, I have sought and executed numerous search and seizure and arrest warrants, including for physical premises, for individuals, for computers and other electronic devices, and for information associated with online accounts and records. I have also engaged in a wide range of other investigative activities, including physical surveillance; debriefing defendants, witnesses, informants, and other individuals with knowledge of the particular criminal scheme; undercover operations; consensual monitoring and recording of conversations; electronic surveillance through the use of pen registers and trap and trace devices; and the handling and maintenance of evidence. Finally, I have testified before federal grand juries and in court in the Eastern District of Virginia.

3. The facts in this Affidavit come from my observations, knowledge, training, and experience, and from information that I have learned, directly or indirectly, from witnesses, records, information from other law enforcement officers, and from my review of documents and other media. Unless otherwise indicated, conversations related herein are described in substance and part rather than verbatim. Likewise, I have not included each and every fact known to me but rather only those necessary to show probable cause to believe that Karon-Omar Gary (GARY) and Andre Billups, Jr. (BILLUPS) have committed violations of 18 U.S.C. § 1708 (Mail Theft and Attempt); 18 U.S.C. § 1704 (Possession of USPS Keys); and 18 U.S.C. § 2 (Aiding and Abetting the same).

**PROBABLE CAUSE IN SUPPORT OF A  
CRIMINAL COMPLAINT AND ARREST WARRANT**

4. In Fiscal Year 2022 (FY22), approximately 412 USPS letter carriers were robbed during the course of their official duties. With 305 incidents reported in the first half of FY23, such incidents are becoming more prevalent. USPS likewise reported an increase in high-volume mail theft incidents from mail receptacles, including blue collection boxes: 38,500 in FY22 and more than 25,000 in the first half of FY23.

5. In 2022 and 2023, USPS has continued to harden the collection box inventory across the country against traditional fishing-related mail theft. While that is making traditional collection box fishing more difficult, USPS has seen an increase in the theft of "Arrow keys," the master keys used to access the variety of mail repositories, including blue collection boxes, outdoor parcel lockers, and apartment mailbox panels. These keys are sold for thousands of dollars on the black market, as criminals seek to acquire them to facilitate the theft of U.S. Mail in connection with other lucrative criminal schemes, like check fraud and identity theft. Because of their wide-ranging access and related value, the possession, use, and transfer of Arrow keys is highly regulated, leading criminals to steal them from postal workers through actual or threatened violence, to recruit postal employee co-conspirators from whom to lease their Arrow keys, and to purchase them illicitly in criminal marketplaces, e.g. via the Dark Web.

6. The USPS Norfolk Domicile office has been investigating a string of armed robberies of USPS mail carriers in the Tidewater area comprised of Hampton, VA and Newport News, VA since at least September 2023. Based on my training and experience I am aware that mail carriers are often targeted and robbed for their USPS issued postal arrow keys for the purpose of accessing blue collection boxes and stealing mail. USPS blue collection boxes often contain an assortment of checks, cash, money orders, and other personally identifiable information. Criminals seek to acquire them to facilitate the theft of U.S. Mail in connection with other lucrative criminal schemes, like card cracking, check fraud, and identity theft.

7. The USPS has received several complaints of mail theft from blue collection boxes in the Tidewater area after the armed robberies of letter carriers in Hampton and Newport News in September 2023. As a result, the USPS deployed several surveillance cameras and license plate reader (LPR) at various blue collection boxes in the area. Based on a review of the surveillance footage, complaints from financial institutions with respect to check fraud, and complaints from

USPS customers who reported to have their checks stolen out of the blue collection boxes, the USPIS planned to conduct a surveillance operation on the blue collection boxes.

8. On December 3, 2023, law enforcement comprised of USPIS Postal Inspectors, the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) Special Agents (SA) and Task Force Officers (TFO) and Newport News Police Department (NNPD) conducted a surveillance operation at the Hidenwood Post Office located 359 Hiden Boulevard, Newport News, Virginia 23606. As part of that operation, a stationery camera was positioned to observe the blue collection boxes associated with that Post Office.

9. Based upon my review of photographs from that camera and notes from the interview of one of the involved officers, in the early hours on December 4, 2023, law enforcement observed a white sedan, appearing to be a Chevrolet Malibu, bearing the Virginia license plate UCL-6898. Based on surveillance photos, the passenger, later identified as Billups, exited the vehicle and approached the blue collection box from the rear, which is the side used to access the box and collect mail. A USPIS Inspector exited her vehicle, approached the suspect vehicle, and attempted stop it via verbal commands. The passenger, believed to be BILLUPS, got back into the suspect vehicle and the driver, believed to be GARY, aggressively drove towards the Inspector in front of the suspect vehicle. The Inspector discharged her service weapon, striking the windshield of the suspect vehicle and the shoulder of the passenger within, and the vehicle proceeded to exit the area in an accelerated manner.

10. NNPD officers, including the forensic crime scene team, responded on scene and began photographing the area. Other members of the investigative team observed mail on the ground near the blue collection box; at least one reported that the collection box did not appear to be damaged.

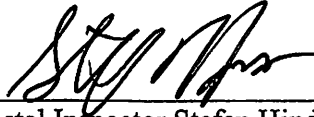
11. Other law enforcement officers stationed nearby heard the discharging and radio traffic and pursued the vehicle. The vehicle fled from law enforcement from Newport News to York County and then to Gloucester County, reaching speeds approaching at least 100 miles per hour according to members of the law enforcement team involved in following the vehicle. Thereafter, Gloucester County law enforcement deployed "stop sticks," a device to disable a vehicle. After the vehicle was disabled, the driver was taken into custody immediately and the passenger fled to a nearby wooded area. Law enforcement observed an AR-style rifle in the backseat of the vehicle. The driver was identified as Karon Omar Gary (GARY) and the passenger was identified as Andre Ephraim Billups Jr. (BILLUPS).

12. After advising GARY of his *Miranda* rights, law enforcement interviewed him. GARY stated that Billups asked him to go out with him and that Billups picked him up in Gloucester in a white vehicle. They drove to Newport News, Virginia, but after stopping at a gas station, and before driving to the Hidenwood Post Office, GARY became the driver and Billups the passenger. BILLUPS provided GARY directions to the Hidenwood Post Office. GARY stated that he observed BILLUPS fidget with the blue collection box and open it.

13. Neither GARY nor BILLUPS were lawfully issued Arrow keys nor did they have authority to possess or use the same.

CONCLUSION

14. Based on the information contained herein, I respectfully submit that probable cause exists to charge that Karon-Omar Gary (GARY) and Andre Billups, Jr. (BILLUPS) with committing violations of 18 U.S.C. § 1708 (Mail Theft and Attempt) and 18 U.S.C. § 1704 (Possession of USPS Keys).



Postal Inspector Stefan Hinds  
United States Postal Inspection Service

This affidavit has been reviewed for legal sufficiency by Assistant U.S. Attorney Julie D. Podlesni.

Reviewed: — See signature  
on face sheet of complaint  
Julie D. Podlesni  
Assistant United States Attorney

Subscribed and sworn before me on December 4<sup>th</sup>, 2023, in the City of Norfolk, Virginia.

  
UNITED STATES MAGISTRATE JUDGE